

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jamie Montcalm,

Civil File No. 07-4182 (RHK/RLE)

Plaintiffs,

vs.

**PROPOSED QUESTIONS
ON VOIR DIRE**

KidsPeace Corporation,

Defendant.

Defendant KidsPeace Corporation respectfully requests that the Court ask the following questions during Voir Dire.

1. What is your name and where do you live?
2. Please tell us about your family.
3. What schools have you attended?
4. What degrees have you earned?
5. By whom are you employed? What are the duties of your employment?
6. Have you had any training in medicine or another health care field? If so, please tell us about that?
7. Have you had any training in psychology or psychiatry? If so, please tell us about that.
8. Have you had any training in auto mechanics? If so, please tell us about that.
9. Have you had any training in law enforcement? If so, please tell us where you received that training and what you recall of it.
10. Have you ever been employed in the corrections field? If so, when and where?

11. Have you ever been employed by the Minnesota Department of Corrections or by the Department of Corrections of any other state or jurisdiction? If so, please tell us about that.

12. Have you ever been employed in the juvenile corrections field? If so, please tell us when and where.

13. Does your occupation or business require a license from any authority in order to operate? If so, please tell us whether you have any responsibility in regard to obtaining or updating the license.

14. Do you know anything of the Mesabi Academy located in Buhl, Minnesota? If so, tell us what you know about it.

15. Have you ever visited the Mesabi Academy in Buhl, Minnesota? If so, tell us when and the purpose of your visit there.

16. Have you ever heard of KidsPeace Corporation? If so, what have you heard?

17. Do you have any reservations about women being employed in the field of law enforcement? If so, please explain.

18. Do you have any reservations about women being employed in the corrections field? If so, please explain.

19. In your business or occupation, are you responsible for supervising others? If so, please explain.

20. Are there any hazards associated with the work that you do or the location where you do it? Please explain.

21. Have you ever been injured seriously enough to require medical care? If so, please explain further.

22. Do you have any injury-related permanent impairments from which you suffer at the present time? If so, please detail them.

23. Have you ever been a party to a lawsuit? Please tell us about that.

24. Have you ever served on a jury before? What did you like about the experience?
What did you not like about the experience?

25. Please tell us if you know any of the following-named individuals. If so, please tell us how you know the person and the nature of your relationship with that person, if any.

(Names of plaintiff's witnesses and defendant's witnesses to be inserted).

26. How do you typically gather information you consider to be reliable for purposes of making decisions either at work or at home? What sources or resources do you generally consult?

27. Do you know of anyone who has been diagnosed or treated for depression, anxiety, or post-traumatic stress disorder? If so, and without revealing the identity of the person, please tell us what you have observed about the condition and the treatment for that condition.

Dated this _____ day of November, 2008.

HANFT FRIDE,
A Professional Association

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